



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 10  
1200 Sixth Avenue  
Seattle, Washington 98101

OR 7392  
7/29/97

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July 29, 1997

Reply To  
Attn Of: WCM-126

Leslie Carlough  
Oregon Department of Environmental Quality  
Enforcement Section  
2020 SW Fourth Avenue, Suite 400  
Portland, OR 97201-4987

Re: Your letter of July 24, 1997 on Van Waters and Rogers'  
Supplemental Environmental Project Proposal

Dear Mr. Carlough:

I read your letter about Van Waters and Rogers (VWR) Supplemental Environmental Project (SEP). Here are my answers to the questions from your letter:

1) The Coordinated Regional Groundwater Study is a result of VWR's work under a 3008(h) Consent Order. Late in 1996, VWR showed that groundwater flow in the vicinity of their Portland Facility (Facility) had changed. EPA encouraged VWR to collect evidence to determine the possible causes for the change in groundwater flow patterns. Among the things EPA suggested was a coordinated groundwater level study in the vicinity of the VWR Facility.

2) The Groundwater study would benefit the EPA and VWR because we are negotiating the remediation of hazardous wastes in the aquifer beneath the Facility. As for benefit to the community, it is my opinion that the data gathered for the groundwater level study will be of use as:

- A) Historical groundwater data
- B) Data that can be used by any other facilities that may need to address concurrent groundwater issues.

The data gathered in this study is not being used to identify other potentially responsible parties .

3) The goals of the groundwater level study are to:

- A) gather data to evaluate the current groundwater flow patterns in the vicinity of the Facility.
- B) this data will help in evaluating Corrective Measures for the Facility.

C) the data gathered could show if any changes will be needed to made in remediation plan for the Facility.

I hope that my answers will give you the information you need to evaluate the VWR SEP proposal. If you have further questions, please call me at (206) 553-6646.

Sincerely,

  
Michael Fagan  
RCRA Compliance Officer

bcc: Rene Fuentes, OESA  
 Bob Hartman, ORC

## CONCURRENCES

NAME & TITLE	Michael Fagan RCRA Compliance Officer			
INITIALS	<i>MF</i>			
DATE	<i>7/29/91</i>			

RCRA POLICY FILE? YES \_\_\_\_\_ NO XXXX

IF Yes, BCC: to Mike Slater.

RCRIS EVENT? YES \_\_\_\_\_ NO XXXX